Mr. Michael Burke
Criterion Catalysts and Technologies, L. P.
1800 East US 12
Michigan City, IN 46360

Re: 091-15004
Third Administrative Amendment to
Part 70 091-6789-00053

Dear Mr. Burke:

Criterion Catalysts and Technologies, L.P. was issued a Title V permit on May 1, 2001 for an alumina powder and specialty chemical production plant. A letter requesting changes in the permit was received on October 30, 2001. The changes relate to applying Criterion's initial performance test for demonstration of compliance for the New Source Performance Standards (40 CFR 60, Subpart UUU). In addition, the changes include the removal of the requirement for a continuous opacity monitor. The changes involve the application of an alternative compliance monitoring system, and do not include an actual relaxation of reporting or record keeping conditions. 326 IAC 2-7-11(a)(7) states that an administrative amendment may be used for changes to "a monitoring, maintenance, or record keeping requirement established by this article that is not environmentally significant". Therefore, the permit is hereby administratively amended as follows (using ~~strike-out~~ to show deletions and **bold** to show additions):

(1) The testing requirements in Section D.3.4 are amended as follows:

D.3.4 Testing Requirements [326 IAC12, (40 CFR 60.730, Subpart UUU)]

(a) ~~In conducting the performance tests required in 40 CFR 60.8, the owner or operator shall use the test methods in appendix A of 40 CFR 60 or other test methods and procedures as specified in this condition, except as provided in 40 CFR 60.8(b).~~
The PM test conducted at the facility on June 12, 1998 was validated by IDEM Compliance Data Section and satisfies the NSPS testing requirements. Therefore, pursuant to 40 CFR 60.8(b)(4), OAQ has decided to waive the requirement for performance tests because the source has demonstrated to the administrator's satisfaction that the affected facility is in compliance with the PM standard.

~~(b) The owner or operator shall determine compliance with particulate matter standards in condition D.3.2 as follows:~~

~~(1) Method 5 shall be used it determine the particulate matter concentration. The sampling time and volume for each test run shall be two hours and 1.70 dscm.~~

~~(2) Method 9 and the procedures in 40 CFR 60.11 shall be used to determine opacity from stack emissions.~~

~~In addition to these requirements,~~ IDEM may require compliance testing when necessary to determine if the facility is in compliance.

(2) The monitoring conditions in Section D.3.7 are amended as follows:

D.3.7 Monitoring of Emissions and Operations [326 IAC12], (40 CFR 60.730, Subpart UUU)

~~Each owner or operator who uses a dry control device (baghouse) to comply with the mass emission standard (condition D.3.2) shall install, calibrate, maintain, and operate a continuous monitoring system to measure and record the opacity of emissions discharged into the atmosphere from the control device.~~

~~An alternative to the continuous opacity monitoring requirements of Subpart UUU may be used if~~ **The source meets** the conditions stated by George T. Czerniak, Jr., Chief Air Enforcement and Compliance Assurance Branch of the U. S. EPA in a letter dated May 25, 2000 in an approval of an alternative monitoring requirement**,** ~~are met. This approval was contingent upon the source performing a stack test to verify~~ **because the stack test conducted on June 12, 1998 demonstrated** that the DCC drier emits less than 11 tons per year. **Therefore, OAQ waives the requirement for continuous opacity monitoring at the facility.** ~~and to establish a pressure drop range for the baghouse. Upon submittal of this information, the source must monitor and record the pressure drop on the baghouse once per shift to assure that the pressure drop is within the range established during the stack test. Additionally, non-method 9 visible daily stack observations from baghouse exhaust shall be recorded.~~ **In lieu of a continuous opacity monitoring system, a certified visible emissions observer shall measure and record three 6-minute averages of the opacity of visible emissions to the atmosphere each day of operation in accordance with Method 9 of appendix A of part 60.**

(3) The record keeping requirements in D.3.10 are amended as follows:

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.10 Record Keeping Requirements

(a) To document compliance with Condition D.3.7, the Permittee shall maintain records of ~~daily~~ **three 6-minute averages of the opacity of** visible emission notations of DCC drier stack exhaust **each day of operation**.

(4) The reporting requirements in Section D.3.11 are amended as follows:

D.3.11 Reporting Requirements [326 IAC12, (40 CFR 60.730, Subpart UUU)]

Each owner or operator shall submit written reports semiannually of exceedances of control device operating parameters required to be monitored by the condition D.3.7 for monitoring of emissions and operations. For the purpose of these reports, exceedances are defined as follows:

(i) All 6-minute periods during which the average opacity from the dry control is greater than 10 percent.

(ii) ~~If the alternative monitoring requirements is used, all~~ **All** periods during which the pressure drop across the baghouse is outside the pressure drop range of 2-4 inches of water or a range established during the latest stack test.

All other conditions of the permit shall remain unchanged and in effect. Please attach a copy of this amendment and the following revised permit pages to the front of the original permit.

This decision is subject to the Indiana Administrative Orders and Procedures Act - IC 4-21.5-3-5. If you have any questions on this matter, please contact Madhurima Moulik, at (800) 451-6027, press 0 and ask for Madhurima Moulik or extension 3-0868, or dial (317) 233-0868.

Sincerely,

Paul Dubenetzky, Chief
Permits Branch
Office of Air Quality

Attachments
mm
cc: File -Laporte County
U.S. EPA, Region V
Laporte County Health Department
Northwest Regional Office
Air Compliance Section Inspector - Rick Massoels
Compliance Data Section - Karen Nowak
Administrative and Development - Janet Mobley
Technical Support and Modeling - Michele Boner

PART 70 OPERATING PERMIT
OFFICE OF AIR QUALITY

Criterion Catalysts and Technologies, L.P.
1800 East US 12
Michigan City, Indiana 46360-2074

(herein known as the Permittee) is hereby authorized to operate subject to the conditions contained herein, the source described in Section A (Source Summary) of this permit.

This permit is issued in accordance with 326 IAC 2 and 40 CFR Part 70 Appendix A and contains the conditions and provisions specified in 326 IAC 2-7 as required by 42 U.S.C. 7401, et. seq. (Clean Air Act as amended by the 1990 Clean Air Act Amendments), 40 CFR Part 70.6, IC 13-15 and IC 13-17.

Operation Permit No.: T091-6789-00053	
Issued by: Janet G. McCabe, Assistant Commissioner Office of Air Quality	Issuance Date: May 1, 2001 Expiration Date: May 1, 2006

First Administrative Amendment No: 091-14560 Issued on: July 26, 2001
Second Administrative Amendment No.: 091- 14707 Issued on: August 24, 2001

Third Administrative Amendment No.: 091-15004	Pages Modified: 35, 36, 37
Issued by: Paul Dubenetzky, Chief Permits Branch Office of Air Quality	Issuance Date:

SECTION D.3 FACILITY OPERATION CONDITIONS

Facility Description [326 IAC 2-7-5(15)]:

(r) One (1) natural gas fired catalyst drier, identified as DCC (drying/calcining/cooling) unit (EX-376), constructed in 1997 rated at ten (10) million British thermal units (MMBtu) per hour using a baghouse for particulate control, and exhausting to stack P4.

(The information describing the process contained in this facility description box is descriptive information and does not constitute enforceable conditions.)

Emission Limitations and Standards [326 IAC 2-7-5(1)]

D.3.1 Particulate Matter (PM) [326 IAC 6-3-2]

Pursuant to 326 IAC 6-3-2 (Process Operations), the allowable PM emission note from the DCC drier shall not exceed the pounds per hour limitation calculated using the following equation:

$E = 4.10\ P^{0.67}$ where E = rate of emission in pounds per hour; and
P = process weight rate in tons per hour

The emission limit is not included because the process throughputs are considered confidential. These emission units are included in an OAQ confidential file.

D.3.2 Particulate Matter [326 IAC 12, (40 CFR 60.730, Subpart UUU)]

Each owner and operator that is subject to 40 CFR 60.730 shall comply with the emission limitations set forth in this condition on and after the date on which the initial performance test required by 40 CFR 60.80 is completed, but not later than 180 days after initial startup, whichever date comes first. No emissions shall be discharged into the atmosphere for any affected facility (DCC) that:

(a) Contains particulate matter in excess of 0.057 g/dscm

(b) Exhibits greater than 10 percent opacity

D.3.3 Preventive Maintenance Plan [326 IAC 2-7-5(13)]

A Preventive Maintenance Plan, in accordance with Section B - Preventive Maintenance Plan, of this permit, is required for this facility and its control device.

Compliance Determination Requirements

D.3.4 Testing Requirements [326 IAC12, (40 CFR 60.730, Subpart UUU)]

(a) The PM test conducted at the facility on June 12, 1998 was validated by IDEM Compliance Data Section and satisfies the NSPS testing requirements. Therefore, pursuant to 40 CFR 60.8(b)(4), OAQ has decided to waive the requirement for performance tests because the source has demonstrated to the administrator's satisfaction that the affected facility is in

compliance with the PM standard.

IDEM may require compliance testing when necessary to determine if the facility is in compliance.

D.3.5 Particulate Matter (PM)

In order to comply with D.3.1 and D.3.2, the baghouse for PM control shall be in operation and control emissions from the DCC drier at all times that the DCC drier is in operation.

Compliance Monitoring Requirements [326 IAC 2-7-6(1)] [326 IAC 2-7-5(1)]

D.3.6 Parametric Monitoring

The Permittee shall record the total static pressure drop across the baghouse used in conjunction with the DCC drier, at least once per shift when the process is in operation when venting to the atmosphere. Unless operated under conditions for which the Compliance Response Plan specifies otherwise, the pressure drop across the baghouse shall be maintained within the range of 2.0 and 4.0 inches of water or a range established during the latest stack test. The Compliance Response Plan for this unit shall contain troubleshooting contingency and response steps for when the pressure reading is outside of the above mentioned range for any one reading. Failure to take response steps in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

The instrument used for determining the pressure shall comply with Section C - Pressure Gauge and Other Instruments Specifications, of this permit, shall be subject to approval by IDEM, OAQ, and shall be calibrated at least once every six (6) months.

D.3.7 Monitoring of Emissions and Operations [326 IAC12], (40 CFR 60.730, Subpart UUU)

The source meets the conditions stated by George T. Czerniak, Jr., Chief Air Enforcement and Compliance Assurance Branch of the U. S. EPA in a letter dated May 25, 2000 in an approval of an alternative monitoring requirement, because the stack test conducted on June 12, 1998 demonstrated that the DCC drier emits less than 11 tons per year. Therefore, OAQ waives the requirement for continuous opacity monitoring at the facility. In lieu of a continuous opacity monitoring system, a certified visible emissions observer shall measure and record three 6-minute averages of the opacity of visible emissions to the atmosphere each day of operation in accordance with Method 9 of appendix A of part 60.

D.3.8 Baghouse Inspections

An inspection of the baghouses shall be performed each calendar quarter. In the event that a unit is under production at the end of the quarter and the unit is operating within normal visible emissions levels and pressure drop levels, then the Permittee may postpone the inspection no later than 30 days after the end of the quarter. Defective bags shall be replaced. A record shall be kept of the results of the inspection and the number of bags replaced. This condition replaces operation condition no. 11(d) from the CP 091-8507-00053 issued on July 31, 1997.

D.3.9 Broken or Failed Bag Detection

In the event that bag failure has been observed:

(a) For multi-compartment units, the affected compartments will be shut down immediately

until the failed units have been repaired or replaced. Operations may continue only if there are no visible emissions or if the event qualifies as an emergency and the Permittee satisfies the emergency provisions of this permit (Section B - Emergency Provisions). Within eight (8) business hours of the determination of failure, response steps according to the timetable described in the Compliance Response Plan shall be initiated. For any failure with corresponding response steps and timetable not described in the Compliance Response Plan, response steps shall be devised within eight (8) business hours of discovery of the failure and shall include a timetable for completion.

Failure to take response in accordance with Section C - Compliance Monitoring Plan - Failure to Take Response Steps, shall be considered a violation of this permit.

(b) For single compartment baghouses, failed units and the associated process will be shut down immediately until the failed units have been repaired and replaced. Operations may continue only if the event qualifies as an emergency and the Permittee satisfies the requirements of the emergency provisions of this permit (Section B - Emergency Provisions).

Record Keeping and Reporting Requirement [326 IAC 2-7-5(3)] [326 IAC 2-7-19]

D.3.10 Record Keeping Requirements

(a) To document compliance with Condition D.3.7, the Permittee shall maintain records of three 6-minute averages of the opacity of visible emission notations of DCC drier stack exhaust each day of operation.

(b) To document compliance with Condition D.3.6 (and D.3.7 once stack test data is submitted pursuant to Condition D.3.7), the Permittee shall maintain the following:

(1) Weekly records of the following operational parameters during normal operation when venting to the atmosphere (Records once per shift shall be maintained once stack test data is submitted pursuant to Condition D.3.7):

(A) Inlet and outlet differential static pressure; and

(B) Cleaning cycle operation.

(2) Documentation of the dates vents are redirected.

(c) To document compliance with Condition D.3.8, the Permittee shall maintain records of the results of the inspections required under Condition D.3.8 and the dates the vents are redirected.

D.3.11 Reporting Requirements [326 IAC12, (40 CFR 60.730, Subpart UUU)]

Each owner or operator shall submit written reports semiannually of exceedances of control device operating parameters required to be monitored by the condition D.3.7 for monitoring of emissions and operations. For the purpose of these reports, exceedances are defined as follows:

(i) All 6-minute periods during which the average opacity from the dry control is greater than 10 percent.

(ii) All periods during which the pressure drop across the baghouse is outside the pressure drop range of 2-4 inches of water or a range established during the latest stack test.